

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

VALVETECH, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No. 6:17-cv-06788-FPG-MWP
AEROJET ROCKETDYNE, INC.,	:	
	:	
Defendant.	:	

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**DECLARATION OF JOHN D. ESTERHAY IN SUPPORT OF  
MOTION TO FILE DOCUMENTS UNDER SEAL**

I, John D. Esterhay, hereby declare:

1. I am an attorney at the law firm of Perkins Coie LLP, counsel of record to Plaintiff ValveTech, Inc. (“ValveTech”). I have personal knowledge of the facts set forth in this declaration and can testify competently to them if called upon to do so.

2. I submit this declaration in support of ValveTech’s motion to file the under seal the following documents:

- a. Plaintiff Valvetech, Inc.’s Motion *in Limine* Submitting all Unresolved Objections to Video Deposition Testimony Pursuant to Local Rule 30(C)(4);
- b. The December 2, 2020, deposition transcript of Lisa Peterson;
- c. The January 27, 2021, deposition transcript of Andy Krochmalny;
- d. The January 28, 2021, deposition transcript of Jesse Ramos;
- e. The January 29, 2021, deposition transcript of Earl Peterson;
- f. The February 1, 2021, deposition transcript of Matthew Barber;
- g. The February 2, 2021, deposition transcript of Martin Bleck;

- h. The February 3, 2021, deposition transcript of Alfred Little;
- i. The February 24, 2021, deposition transcript of Janet Putz; and
- j. The March 9, 2021, deposition transcript of Joel Landau.

3. The purpose of filing these documents under seal is to protect confidential information pursuant to ECF No. 9, which, in relevant part, instructs the clerk “to seal all filings in this action that include Plaintiff’s proprietary information, including, but not limited to, information relating to schematics, research and development information, sketches, prototypes, data, exemplars, designs, drawings, or any other information that was treated or designated as proprietary when Plaintiff shared it with Defendant.” (Dkt. No. 9.). Such information is included in and/or referred to in Plaintiff ValveTech, Inc.’s Motion *in Limine* Submitting all Unresolved Objections to Video Deposition Testimony Pursuant to Local Rule 30(C)(4) and the deposition transcripts of Lisa Peterson, Andy Krochmalny, Jesse Ramos, Earl Peterson, Matthew Barber, Martin Bleck, Alfred Little, Janet Putz, and Joel Landau.

4. Accordingly, ValveTech, Inc. requests permission to file the above-referenced documents under seal to protect the parties’ confidential information.

5. Attached to the Notice of Motion to File Documents Under Seal is a Proposed Order Granting ValveTech’s Motion to File Under Seal.

WHEREFORE, Plaintiff ValveTech, Inc. seeks the Court’s permission to file under seal the following documents:

- a. Plaintiff ValveTech, Inc.’s Motion *in Limine* Submitting all Unresolved Objections to Video Deposition Testimony Pursuant to Local Rule 30(C)(4);
- b. The December 2, 2020, deposition transcript of Lisa Peterson;
- c. The January 27, 2021, deposition transcript of Andy Krochmalny;

- d. The January 28, 2021, deposition transcript of Jesse Ramos;
- e. The January 29, 2021, deposition transcript of Earl Peterson;
- f. The February 1, 2021, deposition transcript of Matthew Barber;
- g. The February 2, 2021, deposition transcript of Martin Bleck;
- h. The February 3, 2021, deposition transcript of Alfred Little;
- i. The February 24, 2021, deposition transcript of Janet Putz; and
- j. The March 9, 2021, deposition transcript of Joel Landau.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Executed on October 4, 2023.

/s/ John D. Esterhay  
John D. Esterhay